

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Cause No: 4:17-CR-00651-1
	§	
FREDDY MONTE, et al	§	

**DEFENDANT FREDDY MONTES' REQUEST FOR
DISCLOSURE PURSUANT TO RULE 16**

COMES NOW, FREDDY MONTES, Defendant in the above cause, by and through his attorney of record, Windi Akins Pastorini, and makes this his Request For Disclosure Pursuant to Rule 16 of the Federal Rules of Criminal Procedure. In particular, the Defendant requests disclosure of the following:

1. All oral statements made by the Defendant (16)(1)(A);
2. Any relevant written or recorded statement by the Defendant if statement is within the government's possession, custody, or control; and the attorney for the government knows—or through due diligence could know—that the statement exists (16)(1)(B)(i);
4. The portion of any written record containing the substance of any relevant oral statement made before or after arrest if the Defendant made the statement in response to interrogation by a person the Defendant knew was a government agent (16)(1)(B)(ii);

5. The Defendant's prior criminal record (16)(1)(D);
6. All documents and objects if the item is material to the defense (16)(1)(E)(i);
7. All documents and objects if the government intends to use the item in its case-in-chief at trial (16)(1)(E)(ii);
8. All documents and objects if the item was obtained or belongs to the Defendant (16)(1)(E)(iii).
9. All reports of examinations and tests if (i) the item is within the government's possession, custody, or control; (ii) the attorney for the government knows—or through due diligence could know—that the item exists; and (iii) the item is material to preparing the defense or the government intends to use the item in its case-in-chief at trial (16)(1)(F).
10. A written summary of any testimony that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial. If the government requests discovery under subdivision (b)(1)(C)(ii) and the Defendant complies, the government must, at the Defendant's request, give to the Defendant a written summary of testimony that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence as evidence at trial on the issue of the Defendant's mental condition. The summary provided under this subparagraph must describe the

witness's opinions, the bases and reasons for those opinions, and the witness's qualifications.

Respectfully submitted,

/s/ Windi Akins Pastorini
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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was served on the Assistant United States Attorneys assigned to this case via electronic filing through the Clerk's CM/ECF system on this the 12th of March, 2018.

/s/ Windi Akins Pastorini
WINDI AKINS PASTORINI